

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:24-CV-20546- WILLIAMS/GOODMAN

WINSTON MARACALLO,

Plaintiff,

vs.

CUSANO AIR CONDITIONING  
& HEATING, INC. AND JOHN E.  
CUSANO,

Defendants.

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**SCHEDULE JOINTLY PROPOSED BY THE PARTIES**

This MATTER is set for jury trial for the week of May 30, 2025. The Parties propose to adhere to the following schedule:

May 14, 2024	The Parties shall furnish their initial disclosures pursuant to Fed. R. Civ. P. 26. The Parties are under a continuing obligation to furnish supplements within ten (10) days of receipt or other notice of new or revised information.
July 29, 2024	The Parties shall file motions to amend pleadings or join Parties.
October 28, 2024	Plaintiff(s) shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
November 11, 2024	Defendant(s) shall disclose experts, expert witness summaries and reports, as required by Federal Rule of Civil Procedure 26(a)(2).
November 25, 2024	The Parties shall exchange rebuttal expert witness summaries and reports, as required by Fed. R. Civ. P. 26(a)(2).
January 31, 2025	The Parties shall complete all discovery, including expert discovery.
January 31, 2025	The Parties shall complete mediation and file a mediation report with the Court.
February 28, 2025	The Parties shall file all dispositive pre-trial motions and memoranda of law. The Parties shall also file any motions to strike or exclude expert

	testimony, whether based on Fed. R. Evid. 702 and <i>Daubert v. Merrell Dow Pharmaceuticals, Inc.</i> , 509 U.S. 579 (1993), or any other basis.
March 31, 2025	The Parties shall each file one motion <i>in limine</i> . All motions <i>in limine</i> must be filed at least six (6) weeks before Calendar Call.
May 16, 2025	The Parties shall file their joint pretrial stipulation, witness lists, and exhibit lists in accordance with Local Rule 16.1(d) and (e). The Parties shall also file proposed jury instructions and a proposed verdict form, or statement of fact and conclusions of law (for non-jury trials).
April 18, 2025	The Parties shall submit their deposition designations.

Respectfully submitted this 1st day of May 2024.

s/ Patrick Brooks LaRou

Brian H. Pollock, Esq.

Florida Bar No. 174742

brian@fairlawattorney.com

Patrick Brooks LaRou, Esq.

Florida Bar No. 1039018

brooks@fairlawattorney.com

**FAIRLAW FIRM**

135 San Lorenzo Avenue, Suite 770

Coral Gables, Florida 33146

Telephone: (305) 230-4884

*Counsel for Plaintiff*

s/ John Y. Doty

Charles S. Caulkins, Esq.

Florida Bar No. 0461946

ccaulkins@fisherphillips.com

John Y. Doty, Esq.

Florida Bar No. 1030883

jdoty@fisherphillips.com

**FISHER & PHILLIPS, LLP**

201 East Las Olas Boulevard, Suite 1700

Fort Lauderdale, Florida 33301

Telephone: (954) 847-4700

*Counsel for Defendants*